



September 4, 2008

Christopher Kent
Product Manager
ENERGY STAR Product Specification Development
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
MC 6202J
Washington, DC 20460

Dear Christopher:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following comments on the ENERGY STAR Draft 1 Version 5.0 displays specification dated July 24, 2008. These comments were developed by the CEE Consumer Electronics Committee after a review of that draft. Thank you for the opportunity to provide input. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE is pleased that EPA is revisiting this specification (formerly the PC monitors specification) to ensure that the ENERGY STAR mark continues to identify the top performing products in terms of energy efficiency. Though the current estimated market penetration of 90 percent for these products demonstrates the success of the program, it significantly reduces the differentiation provided by the mark for consumers and for our members. The overall qualification rate of 26 percent under the draft Version 5.0 specification is more in line with a product differentiation that is consistent with ENERGY STAR, though we encourage EPA to closely monitor advances in market adoption of ENERGY STAR-labeled display products. Rapid technological innovation in this category may quickly result in a market penetration rate significantly higher than today's estimates.

Strong data on market penetration and energy savings of ENERGY STAR-labeled products are essential for our members' consideration of this specification proposal and future program planning activities. We would like to reiterate our comments from the discussion guide requesting detailed information regarding energy savings opportunities--both on a per-unit basis and in the aggregate--for the products that are covered under the specification. In those comments we also sought data on any additional costs consumers might bear for products that comply with the revised specification. We would ask that all of this information at a minimum—as well as demand savings and impact information—be included in the information presented at the stakeholders meeting on September 25 if not in Draft 2 of the specification.

We note that you have strengthened language in the partner agreement regarding data submission and appreciate this inclusion. Committee members have shared that it would also be helpful to have identifying information (manufacturer, model number) for the models in the data set supporting the specification development to the extent that it does not represent confidential information.

CEE supports EPA's intent with testing and luminance settings and sees the merit in having products tested and qualified with the same settings consumers receive when they purchase and use the units, and that those setting optimize display viewing for those consumers. We will be interested in hearing from manufacturer stakeholders whether EPA's requirement is likely to achieve the intended result.

Thank you again for the opportunity to provide comments. CEE looks forward to continuing our participation in this specification development process, including participating in the stakeholder meeting and commenting on future drafts. If you have any questions about these comments, please direct them to Margie Lynch, Program Manager, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

BC Hydro
Efficiency Vermont
National Grid
Natural Resources Defense Council
Northeast Energy Efficiency Partnerships
NSTAR
Pacific Gas and Electric
PacifiCorp
Wisconsin Focus on Energy